

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 8, 2012

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the National Space Club's Breakfast on February 8, 2012

On February 8, 2012, the National Space Club (NSC) will host and sponsor a breakfast at the Ritz-Carlton, Pentagon City, Virginia, from 8 am – 10 am. The NSC is a non-profit organization under Section 501(c)(6) of the IRS code that does not employ lobbyists, and which is composed of individual and corporate members, including NASA contractors.

The breakfast will be attended by senior leaders of the aerospace industry, congressional staff, representatives from academia and the media, personnel from other Federal agencies, and other members of the general public. Approximately 200 people have been invited. The estimated cost of the breakfast, which includes all food and beverages, is \$35.00 per person. I find that the NSC event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Accordingly, NASA employees—including non-career appointees required to sign the President's Ethics Pledge required by Executive Order 13490—whose duties do not substantially affect the NSC, or a majority or all of its corporate members, may accept an invitation for free attendance to the luncheon. A current list of NSC corporate members is available at <http://www.spaceclub.org/about/corporate.html>.

NASA employees whose duties may substantially affect the NSC or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in blue ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone